

KIMBERLY A. SANCHEZ
Acting United States Attorney
JESSICA DELANEY
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL CHARTRAW,

Defendant.

CASE NO. 2:24-CR-00311-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
~~[PROPOSED]~~ FINDINGS AND ORDER

DATE: August 1, 2025
TIME: 9:30 a.m.
COURT: Hon. Dena Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 1, 2025.
2. By this stipulation, defendant now moves to continue the status conference until November 14, 2025, and to exclude time between August 1, 2025, and November 14, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced over 4,500 pages of discovery associated with this case, which includes financial documentation, investigative reports, location tracing information, records of cryptocurrency transactions, and witness reports, in addition to voluminous productions of digital data obtained from remote computing services. All of this discovery has

1 been either produced directly to counsel and/or made available for inspection and copying.

2 b) In addition to the produced discovery, the government is also working on a
3 forensic extraction of a relevant cell phone, including employing filter procedures to ensure that
4 no privileged information is inadvertently accessed by the prosecution team.

5 c) Counsel for the defendant has represented that the produced discovery consists of
6 at least 6 large binders, in addition to the electronic evidence, and that he has not yet had an
7 opportunity to complete his review of the produced discovery. Counsel for the defendant has
8 represented that he has recently completed two murder trials, which have impacted his ability to
9 review the discovery. Counsel for the defendant has also represented that he is conducting his
10 own investigation.

11 d) Since the last status conference, the government has extended a plea offer to the
12 defendant, and the parties are engaged in the negotiation of terms.

13 e) Counsel for defendant believes that failure to grant the above-requested
14 continuance would deny him/her the reasonable time necessary for effective preparation, taking
15 into account the exercise of due diligence. Counsel for defendant also desires additional time to
16 consult with his client and conduct his own investigation.

17 f) This is the second request to continue the status conference in this case. The
18 previous order to continue the status conference was signed by this Court on May 1, 2025.

19 g) The government does not object to the continuance.

20 h) Based on the above-stated findings, the ends of justice served by continuing the
21 case as requested outweigh the interest of the public and the defendant in a trial within the
22 original date prescribed by the Speedy Trial Act.

23 i) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
24 et seq., within which trial must commence, the time period of August 1, 2025 to November 14,
25 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
26 T4] because it results from a continuance granted by the Court at defendant's request on the basis
27 of the Court's finding that the ends of justice served by taking such action outweigh the best
28 interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 22, 2025

KIMBERLY A. SANCHEZ
Acting United States Attorney

/s/ JESSICA DELANEY
JESSICA DELANEY
Assistant United States Attorney

Dated: July 22, 2025

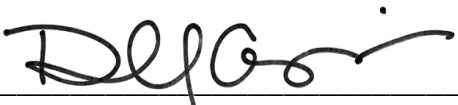
/s/ ANDREW FLIER
ANDREW FLIER
Counsel for Defendant
DANIEL CHARTRAW

ORDER

The court having received, read and considered the parties' Stipulation and good cause appearing therefrom ADOPTS the parties' Stipulation. Accordingly, the Status Conference set for August 1, 2025, is VACATED and RESET for November 14, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena Coggins. The court hereby finds that the Stipulation, which the Court incorporates by reference into this Order, demonstrates facts that provide a basis to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. Time is excluded under the Speedy Trial Act between August 1, 2025, and November 14, 2025, inclusive.

IT IS SO ORDERED.

Dated: July 23, 2025


Dena Coggins
United States District Judge